

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

NICHOLE LEIB, KEVIN
BROKENSHERE, and DIANE
WEIGLEY, individually and on behalf
of all others similarly situated,

Plaintiffs,

v.

GEISINGER HEALTH and
EVANGELICAL COMMUNITY
HOSPITAL,

Defendants.

Case No. 4:21-cv-00196-MWB

JESSICA SAUER, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

GEISINGER HEALTH and
EVANGELICAL COMMUNITY
HOSPITAL,

Defendants.

Case No. 4:21-cv-00263-MWB

**UNOPPOSED MOTION FOR ENTRY OF CASE MANAGEMENT ORDER
NO. 1**

Plaintiffs Nichole Leib, Kevin Brokenshire, Diane Weigley, and Jessica Sauer respectfully submit this motion in support of the attached proposed Case Management Order No. 1 (“CMO No. 1”). Defendants Geisinger Health and Evangelical Community Hospital do not oppose this motion.

The proposed CMO No. 1 seeks to accomplish two main tasks. First, it consolidates *Leib, et al. v. Geisinger Health, et al.*, 4:21-cv-00196-MWB (M.D. Pa.) and *Sauer v. Geisinger Health, et al.*, 4:21-cv-00263-MWB (M.D. Pa.), pursuant to Fed. R. Civ. P. 42(a), to create a consolidated docket for any actions that are based on substantially the same facts and allegations against Defendants that may subsequently be filed in, transferred to, or removed to this Court. Second, the proposed CMO No. 1 establishes Interim Co-Lead Class Counsel under Fed. R. Civ. P. 23(g). In particular, it proposes appointing Berger Montague PC and Cotchett, Pitre & McCarthy, LLP as Interim Co-Lead Class Counsel for the proposed class in the consolidated action.

In support of this motion, the following documents have been submitted:

- Plaintiffs’ Memorandum of Law in Support of Unopposed Motion for Entry of Case Management Order No. 1;
- Declaration of Eric L. Cramer, Esq.;
- Declaration of Adam J. Zapala, Esq.; and
- [Proposed] Case Management Order No. 1.

Dated: March 5, 2021

/s/ Eric L. Cramer

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CERTIFICATE OF CONCURRENCE

In accordance with Local Rule 7.1 of the Rules of Court of the United States District Court for the Middle District of Pennsylvania, I certify that counsel for all parties concurred in the **UNOPPOSED MOTION FOR ENTRY OF CASE MANAGEMENT ORDER NO. 1** submitted to the Court filed by ECF on this day.

/s/ Eric L. Cramer

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 5th day of March 2021 a true and correct copy of **UNOPPOSED MOTION FOR ENTRY OF CASE MANAGEMENT ORDER NO. 1** was filed with the Court's Case Management/Electronic Case Filing System and served upon all counsel known to be representing the Defendants, including:

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